



THE CITY OF NEW YORK
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June 22, 2022

BY E.C.F.

Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Rayne Valentine v. City of New York, et al.,
21-CV-4867 (EK) (VMS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. In that capacity, I write to respectfully request that the Court, *sua sponte*, extend the time for all defendants to answer or otherwise respond to the Amended Complaint by forty-five days, from June 23, 2022 to August 8, 2022. Plaintiff's counsel does not consent to this request¹. This is the second request for an extension of time to file a response to the Amended Complaint, and the first request was granted by the Court. The undersigned apologizes that this application was not submitted two business days in advance of the current deadline as required by Your Honor's Individual Rules.

By Order dated June 2, 2022, the deadline for the remaining defendants to answer or otherwise respond to the Amended Complaint is June 23, 2022. This Office is still in the process of determining representation for some of the individual defendants². Some of the representation interviews were already conducted. However, upon information and belief, scheduling representation interviews for some of the individual defendants posed challenges due to scheduling conflicts and availability of the officers. Prior defense counsel, Joshua S. Kaufman, has recently left this office and this Office is currently in the process of assigning new defense counsel to this

¹ Plaintiff plans to submit an application to the Court seeking to extend their time to file an amended pleading, to which this Office consents. Accordingly, in order to avoid confusion and duplicative responses to the operative pleading, this Office respectfully request a *sua sponte* extension of time to file one response to the operative pleading after plaintiff files their Second Amended Complaint.

² There are currently 18 individual defendants in this case.

case. After this case is reassigned, newly assigned counsel will need additional time to familiarize themselves with the facts of this case, conduct the remaining representation interviews and prepare a response to the Amended Complaint.

Therefore, in light of the above, this Office respectfully request an extension of time for defendants to answer or otherwise respond to the Amended Complaint by forty-five days, from June 23, 2022, to August 8, 2022. Alternatively, as mentioned above in footnote 1, this Office respectfully request for a single date for defendants to answer or respond to the Complaint sometime after plaintiff files their anticipated Second Amended Complaint in order to avoid confusion and duplicative responses.

The undersigned thanks the Court for its consideration herein.

Respectfully submitted,

William T. Gosling /S/ _____
William T. Gosling
Assistant Corporation Counsel

cc: **BY ECF**
All Counsel of Record